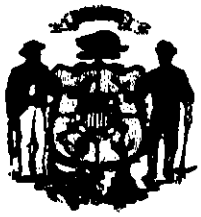
State of Wisconsin



Deparmtent of Agriculture, Trade and Consumer Protection
Department of Natural Resources

December 20, 1999

Gulf of Mexico Hypoxia Working Group
National Centers for Coastal Ocean Science
WS 113446 SSMC4
1305 East-West Highway
Silver Spring, MD 20910

Subject: Integrated Assessment

Dear Members of the Working Group,

We are writing to provide comments on the draft integrated assessment report for the Gulf of Mexico hypoxia conditions as indicated in the October 21,1999 Federal Register notice. We appreciate the opportunity to review this scientific assessment and to provide you with our thoughts on the report.

It was our view that the Integrated Assessment Report was to be the summary compilation of the six technical reports. With this in mind, it is our belief that the assessment should identify both the "knowns" and the "unknowns" regarding the state of scientific conclusions on the extent, duration, severity, impacts and causes of a hypoxic zone in the Gulf of Mexico. To address this concern, it would be appropriate to include the conclusions from the scientific workshop which was held December 3,1999 in St. Louis. Incorporating these conclusions will help to provide clarity between those areas of scientific consensus and those areas where scientific uncertainty remains.

It is also very important that the report identify the future management options it evaluates as examples only. While these are helpful illustrations of the types of remedial possibilities, it should be explicitly stated that the report was not intended to develop management options and that the examples should not be presumed to be management responses or policy decisions derived from the review of the science. It is critical that the policy makers and the public have the opportunity for full dialogue on possible management options without prejudice or the presumption that management options are limited to only those described in the report.

In an effort to keep this process moving forward, we would suggest the following course of action:

1. Utilize a public consultation process which allows meaningful involvement for all the stakeholder groups; even if the time required for this consultation requires an extension of the deadlines for action plan development. This includes bringing social and economic considerations more fully into the ongoing scientific dialogue. Scientific data can provide a foundation for management discussions but alone, cannot be the basis for identifying appropriate management actions.
2. Involve states as full partners in the process to develop pollutant load reduction goals and management options to achieve those goals.
3. Utilize the principles presented to the Task Force by the Coordination Committee at the November 18,1999 meeting to provide a framework for the action plan:
   - ❖ The action plan needs to clearly state the expected outcomes—these outcomes need not be expressed as numeric goals.
   - ❖ There should be a reasonable time frame for both implementation and evaluation activities.
   - ❖ Implementation actions or management responses must have the flexibility to allow states to develop a variety of approaches which would be functionally equivalent.
   - ❖ There needs to be a monitoring plan or strategy to establish an enhanced approach to data collection and analysis.
   - ❖ There will need to be increased resources to effectively carry out action plan recommendations.

In closing, we remain committed to participation in this effort and look forward to a process which can build on the science through a broad based consultation effort to develop a consensus approach which protects the Mississippi River basin and the Gulf of Mexico.

Sincerely,

George E. Meyer

George Meyer, Secretary
Wisconsin Department of Natural Resources

Ben Brancel

Ben Brancel, Secretary
Wisconsin Department of Agriculture,
Trade and Consumer Protection

c: Carol Browner, EPA
Francis X. Lyons, EPA Region 5
NOAA Coastal Ocean Program